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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 KNOWLEDGE RODRIGUEZ,

13 Defendant.

Case No. 2:25-cr-00004-JCM-BNW

**STIPULATION FOR A PROTECTIVE
ORDER**

14 The parties, by and through the undersigned, respectfully request that the Court
15 issue an order protecting from disclosure to the public, or any third part not directly
16 related to this case, any documents, recordings, or other tangible things produced by the
17 government during discovery that contain the confidential non-public information. The
18 parties state as follows:

19 1. The discovery produced in connection with this case contains confidential
20 non-public information, including information of third parties.

21 2. In order to protect the privacy of the individuals referenced in the discovery,
22 the parties intend to restrict access to the following individuals: attorneys for all parties,
23 the Defendant, and any personnel that the attorneys for all parties consider necessary to
24 assist in performing that attorney's duties in the prosecution or defense of this case,

1 including investigators, paralegals, retained experts, support staff, interpreters, and any
2 other individuals specially authorized by the Court (collectively, the “Covered
3 Individuals”).

4 3. The Covered Individuals shall be advised of the Protective Order, and,
5 without leave of Court, the Covered Individuals shall not:

6 a. make copies for, or allow copies of any kind to be made by any other
7 person of the Protected Information in this case;

8 b. unless otherwise provided in this agreement, allow any other person
9 to read, listen, or otherwise review the Protected Information in this case;

10 c. use the Protected Information for any purpose other than preparing
11 to defend against the charges in this case; or

12 d. attach any Protected Information to any of the pleading, briefs, or
13 other court filings except to the extent those pleadings, briefs, or filings are filed
14 under seal or properly compliant with LR IC 6-1.

15 4. Nothing in this stipulation is intended to restrict the parties’ use or
16 introduction of the Protected Material as evidence at trial or support in motion practice.

17 5. The parties shall inform any person to whom disclosure may be made
18 pursuant to this order of the existence and terms of this Court’s order. The parties reserve
19 the right to seek to modify the terms of this protective order at a later time pursuant to
20 Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need for this protective
21 order cease to exist, on grounds other than a Covered Individual or some other person
22 violating or circumventing its terms, the Government will move expeditiously for its
23 dissolution.
24

6. In the event of an inadvertent disclosure of the Protected Information, the party making or learning of the inadvertent disclosure will immediately:

a. Notify the person to whom the disclosure was made that it contains Protected Information subject to a Protective Order;

b. Make all reasonable efforts to preclude dissemination or use of the Protected Information by the person to whom disclosure was inadvertently made;

c. Notify the Government and other parties of the identity of the person to whom the disclosure was made, the circumstances surround the disclosure, and the steps taken to ensure against further dissemination or the use of the information; and

d. Notify the Court in writing under seal.

7. The defense hereby stipulates to this protective order.

DATED: March 7, 2025.

Respectfully submitted,

SUE FAHAMI
Acting United States Attorney

/s/ Lauren M. Ibanez
Lauren M. Ibanez
Assistant United States Attorney

/s/ Keisha Matthews
Keisha Matthews
Counsel for Defendant

All motions to seal must comply with Local Rule IA 10-5 and *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172 (9th Cir. 2006). **IT IS SO ORDERED.**


HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE

March 10, 2025

DATE